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Counsel for E. Lynn Schoenmann,
Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PETER R. FADER
dba Urchin Capital Partners
dba Urchin Partners LLC,

Debtor.

Case No.: 08-30119-DM

Chapter 7

**DECLARATION OF MIRIAM
MANNING IN SUPPORT OF
PACHULSKI STANG ZIEHL & JONES
LLP'S REPLY TO JOHN GADDY'S
OBJECTION TO FIRST INTERIM
FEE APPLICATION**

Hearing Date

Date: February 3, 2023
Time: 10:30 AM
Place: Courtcall/Videoconference
Judge: Honorable Dennis Montali

I, Miriam Manning, declare as follows:

1. I am an attorney in the law firm of Pachulski Stang Ziehl & Jones LLP. I submit this declaration in support of the *Pachulski Stang Ziehl & Jones LLP's Reply to John Gaddy's Objection to First Interim Fee Application*. I have personal knowledge of the facts set forth herein and, if called as a witness, I would and could competently testify thereto.

2. On January 18, 2023, I was advised by my assistant that Mr. Gaddy had called to request copies of the fee applications that were identified in the *Notice Of Hearing On The First*

1 *Interim Applications of (1) E. Lynn Schoenmann, Chapter 7 Trustee (2) Pachulski Stang Ziehl &*
2 *Jones LLP, Counsel to the Trustee, and (3) Bachecki Crom & Company, Accountants to the Trustee.*

3 3. On January 18, 2023, I emailed each of the fee applications as well as the supporting
4 declaration of Kenneth Brown to Mr. Gaddy. Attached hereto as **Exhibit A** is a true and correct
5 copy of my email to Mr. Gaddy.

6 I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st day
7 of February 2023, at Ross, California.

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9 /s/ Miriam Manning

10 Miriam Manning
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EXHIBIT A

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From: Miriam Manning
Sent: Wednesday, January 18, 2023 1:16 PM
To: 'John Gaddy'
Cc: Kenneth Brown
Subject: Fader - Fee Applications
Attachments: 00130 01-11-23 Trustee's First Interim Fee Application.pdf; 00131 01-11-23 PSZJ Interim Fee App.pdf; 00131-1 01-11-23 KHB Decl iso PSZJ Interim Fee App.pdf; 00132 01-11-23 Ntc re PSZJ and Professional Interim Fee App.pdf; 00129 01-10-23 First Interim App - Bachecki Crom & Co., LLP.PDF

Dear Mr. Gaddy,

I understand that you have requested that our office forward to you the fee applications that were identified the Notice of Hearing. I have therefore attached:

1. First Interim Application for Compensation by Accountant for Trustee [Dkt. 129]
2. Trustee's First Interim Report and Application for Interim Compensation [Dkt. 130]
3. First Interim Application of Pachulski Stang Ziehl & Jones LLP for Allowance and Payment of Compensation and Reimbursement of Expenses for the Period September 16, 2019 through November 28, 2022 [Dkt. 131]
4. Declaration of Kenneth Brown in Support of First Interim Application of Pachulski Stang Ziehl & Jones LLP for Allowance and Payment of Compensation and Reimbursement of Expenses for the Period September 16, 2019 through November 28, 2022 [Dkt. 131-1]
5. Notice of Hearing on the First Interim Applications of (I) E. Lynn Schoenmann, Chapter 7 Trustee (2) Pachulski Stang Ziehl & Jones LLP, Counsel to the Trustee, and (3) Bachecki Crom & Company, Accountants to the Trustee [Dkt. 122]

If you have any questions about the above, please email your questions to me. Best regards,

Miriam Manning
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